

**Wittels
McInturff
Palikovic**

June 20, 2025

Via ECF

Honorable Taryn A. Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Swanson et al. v. Manhattan Beer Distributors, LLC et al.*, No. 15 Civ. 5383-ENV-TAM

Dear Judge Merkl:

The parties write jointly pursuant to Local Civil Rule 7.1(d) to request that the Court extend the stay in this action for an additional 60 days, to August 18, 2025. The stay is currently set to expire on June 20, 2025. The parties apologize for again submitting an extension request, but this settlement process has proved more difficult than anticipated, as explained briefly below.

The reason for this request is that although the parties are continuing to work through issues and have made substantial progress—including providing and analyzing data regarding class membership—in negotiating the final Class Action Settlement Agreement (“Agreement”) and developing a notice plan, a few outstanding issues remain that the parties are hopeful they will be able to resolve. The request for an additional 60 days is to complete the work that remains outstanding and to provide enough time to adequately address the anticipated motion for preliminary approval of the Agreement.

For these reasons, the parties respectfully request a 60-day extension of the stay and deadline to file a motion for preliminary class settlement approval, to August 18, 2025. This is the fourth request to extend the stay the Court originally entered on September 20, 2024. The parties are hopeful that this will be their last request for an extension of the stay.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Steven L. Wittels
Steven L. Wittels

cc: All Counsel of Record (via ECF)